
State:	District of Columbia	Filing Company:	Travelers Casualty and Surety Company of America
TOI/Sub-TOI:	23.0 Fidelity/23.0000 Fidelity		
Product Name:	Investment Company Bond (IVBB) Rate Filing 2014-12-0059-R-EFF		
Project Name/Number:	Investment Company Bond (IVBB) Rate Filing 2014-12-0059-R-EFF/2014-12-0059-R-EFF		

Filing at a Glance

Company:	Travelers Casualty and Surety Company of America
Product Name:	Investment Company Bond (IVBB) Rate Filing 2014-12-0059-R-EFF
State:	District of Columbia
TOI:	23.0 Fidelity
Sub-TOI:	23.0000 Fidelity
Filing Type:	Rate
Date Submitted:	09/04/2015
SERFF Tr Num:	TRVE-130232771
SERFF Status:	Submitted to State
State Tr Num:	
State Status:	
Co Tr Num:	2014-12-0059-R-EFF
Effective Date	07/01/2016
Requested (New):	
Effective Date	07/01/2016
Requested (Renewal):	
Author(s):	Socorro Armstrong, Theresa Lavenburg, Timothy Bengston, Sandy J Olson, Linda Sperry, Stacy Mandelker, Julie Stuart
Reviewer(s):	
Disposition Date:	
Disposition Status:	
Effective Date (New):	
Effective Date (Renewal):	

State: District of Columbia **Filing Company:** Travelers Casualty and Surety Company of America

TOI/Sub-TOI: 23.0 Fidelity/23.0000 Fidelity

Product Name: Investment Company Bond (IVBB) Rate Filing 2014-12-0059-R-EFF

Project Name/Number: Investment Company Bond (IVBB) Rate Filing 2014-12-0059-R-EFF/2014-12-0059-R-EFF

General Information

Project Name: Investment Company Bond (IVBB) Rate Filing Status of Filing in Domicile:
2014-12-0059-R-EFF

Project Number: 2014-12-0059-R-EFF Domicile Status Comments:

Reference Organization: Reference Number:

Reference Title: Advisory Org. Circular:

Filing Status Changed: 09/04/2015

State Status Changed: Deemer Date:

Created By: Linda Sperry Submitted By: Linda Sperry

Corresponding Filing Tracking Number:

Filing Description:
2014-12-0059-R-EFF
Investment Company Bond
Rate Filing

Travelers Casualty and Surety Company of America 3548-31194, 06-0907370

In compliance with the insurance laws and regulations of your jurisdiction, we respectfully submit the attached filing which consists of our request to change the effective date. This filing was previously approved by your department on March 11, 2015 under our filing number 2014-12-0059-R and SERFF Tracking Number TRVE-129907917.

We would like to propose a new implementation date for this filing to be effective July 1, 2016 for all new and renewal business.

Should you have any questions, please feel free to contact me. Thank you for your consideration of this matter.

Company and Contact

Filing Contact Information

Linda Sperry, Regulatory Analyst
One Tower Square
S202B
Hartford, CT 06183

LSperry1@travelers.com
860-277-7096 [Phone]

Filing Company Information

Travelers Casualty and Surety Company of America	CoCode: 31194	State of Domicile: Connecticut
One Tower Square	Group Code: 3548	Company Type:
2S2B	Group Name:	State ID Number:
Hartford, CT 06183	FEIN Number: 06-0907370	
(860) 277-0179 ext. [Phone]		

Filing Fees

Fee Required?	No
Retaliatory?	No

State:	District of Columbia	Filing Company:	Travelers Casualty and Surety Company of America
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Fee Explanation:

State:	District of Columbia	Filing Company:	Travelers Casualty and Surety Company of America
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Rate Information

Rate data applies to filing.

Filing Method:

Rate Change Type: Decrease

Overall Percentage of Last Rate Revision: 0.000%

Effective Date of Last Rate Revision:

Filing Method of Last Filing:

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Travelers Casualty and Surety Company of America	13.400%	-33.000%	\$-9,890	1	\$29,970	-33.000%	0.000%

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Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Investment Company Bond	55909 DC - Rate Pages 1-11	New		55909 DC 201501.pdf

Guide(a) Rates

Travelers Casualty and Surety Company of America

District of Columbia

Filing Number: 2014-12-0059

EMPLOYEE RATE SCHEDULE

The table below indicates a charge per employee for the indicated bands. Basic rates apply to insuring agreements listed below.

Number of Employees	Rate per Employee
first 5	\$970.40 (flat charge)
next 5	\$194.00
next 10	\$36.38
next 30	\$24.25
next 50	\$16.17
next 50	\$10.78
next 50	\$8.98
next 100	\$5.98
next 200	\$4.99
next 500	\$4.16
next 500	\$2.78
next 1000	\$2.31
next 2500	\$1.93
next 5000	\$1.28
above 10000	\$0.86

A.1.: Fidelity - Larceny or Embezzlement
A.2.: Fidelity - Restoration Expense
D: Forgery or Alteration
E: Securities
G: Claim Expense
H: Stop Payment Orders or Wrongful Dishonor of Checks
I.1.: Computer Systems - Computer Fraud
I.2.: Computer Systems - Fraudulent Instructions
I.3.: Computer Systems - Restoration Expense
J: Uncollectible Items of Deposit
Endorsement: Unauthorized Signature

Guide(a) Rates

Travelers Casualty and Surety Company of America

District of Columbia**Filing Number: 2014-12-0059****EMPLOYEE INCREASED LIMIT and RETENTION FACTORS**

Determine the increased limit and retention premium by applying the calculated factor below to the basic premium.

Calculation:

Total limit = limit + retention

Final Factor = factor (total limit) - factor (retention)

For limits greater than 500M, calculate the ILF based on the following:

$$\text{ILF}(\text{limit}) = \{ \text{ILF}(500\text{M}) - \text{ILF}(200\text{M}) \} / 300\text{M} \times \{ \text{limit} - 500\text{M} \} + \text{ILF}(500\text{M})$$

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

EMPLOYEE INCREASED LIMIT and RETENTION FACTORS (continued)

Total Limit or Retention Amount	Employee count					
	1 to 50	51 to 100	101 to 150	151 to 200	201 to 300	301 to 500
\$0	-0.1500	-0.1500	-0.1500	-0.1500	-0.1500	-0.1500
\$5,000	-0.1098	-0.1098	-0.1098	-0.1104	-0.1116	-0.1123
\$10,000	-0.0698	-0.0698	-0.0698	-0.0710	-0.0733	-0.0746
\$15,000	-0.0300	-0.0300	-0.0300	-0.0317	-0.0350	-0.0369
\$20,000	0.0094	0.0094	0.0094	0.0074	0.0031	0.0007
\$25,000	0.0487	0.0487	0.0487	0.0463	0.0412	0.0382
\$50,000	0.0919	0.0919	0.0919	0.0884	0.0798	0.0748
\$75,000	0.1315	0.1315	0.1315	0.1272	0.1162	0.1097
\$100,000	0.1685	0.1685	0.1685	0.1637	0.1508	0.1431
\$150,000	0.2373	0.2373	0.2373	0.2315	0.2160	0.2067
\$200,000	0.3006	0.3006	0.3006	0.2941	0.2770	0.2668
\$250,000	0.3599	0.3599	0.3599	0.3528	0.3349	0.3241
\$500,000	0.6268	0.6147	0.6147	0.6071	0.5909	0.5809
\$750,000	0.8360	0.8245	0.8230	0.8181	0.8088	0.8029
\$1,000,000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
\$1,250,000	1.1330	1.1496	1.1538	1.1602	1.1707	1.1775
\$1,500,000	1.2436	1.2793	1.2895	1.3032	1.3248	1.3390
\$1,750,000	1.3373	1.3932	1.4107	1.4321	1.4651	1.4871
\$2,000,000	1.4180	1.4944	1.5198	1.5494	1.5938	1.6236
\$2,250,000	1.4882	1.5851	1.6189	1.6568	1.7124	1.7501
\$2,500,000	1.5500	1.6669	1.7094	1.7557	1.8224	1.8678
\$2,750,000	1.6049	1.7413	1.7926	1.8471	1.9246	1.9777
\$3,000,000	1.6539	1.8092	1.8693	1.9320	2.0201	2.0808
\$3,500,000	1.7381	1.9290	2.0064	2.0852	2.1936	2.2689
\$4,000,000	1.8076	2.0316	2.1258	2.2199	2.3474	2.4367
\$4,500,000	1.8662	2.1205	2.2308	2.3396	2.4850	2.5877
\$5,000,000	1.9162	2.1984	2.3241	2.4468	2.6091	2.7243
\$6,000,000	1.9969	2.3287	2.4829	2.6312	2.8243	2.9628
\$7,000,000	2.0593	2.4336	2.6133	2.7847	3.0051	3.1644
\$10,000,000	2.1825	2.6538	2.8955	3.1234	3.4098	3.6202
\$15,000,000	2.2879	2.8603	3.1728	3.4659	3.8276	4.0973
\$20,000,000	2.3933	3.0667	3.4500	3.8085	4.2453	4.5744
\$25,000,000	2.4986	3.2732	3.7273	4.1510	4.6630	5.0515
\$30,000,000	2.6040	3.4797	4.0046	4.4936	5.0808	5.5285
\$40,000,000	2.8148	3.8926	4.5591	5.1786	5.9162	6.4827
\$50,000,000	3.0255	4.3055	5.1137	5.8637	6.7517	7.4369
\$60,000,000	3.2363	4.7185	5.6682	6.5488	7.5872	8.3911
\$70,000,000	3.4470	5.1314	6.2228	7.2339	8.4226	9.3452
\$80,000,000	3.6578	5.5443	6.7773	7.9190	9.2581	10.2994
\$90,000,000	3.8685	5.9573	7.3319	8.6041	10.0935	11.2536
\$100,000,000	4.0793	6.3702	7.8865	9.2891	10.9290	12.2078
\$125,000,000	4.6062	7.4025	9.2728	11.0018	13.0177	14.5932
\$150,000,000	5.1331	8.4349	10.6592	12.7145	15.1063	16.9786
\$200,000,000	6.1868	10.4995	13.4320	16.1399	19.2837	21.7495
\$500,000,000	12.5094	22.8875	30.0685	36.6924	44.3476	50.3747

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

EMPLOYEE INCREASED LIMIT and RETENTION FACTORS (continued)

Total Limit or Retention Amount	Employee count				
	501 to 1000	1001 to 1500	1501 to 2500	2501 to 5000	5001 and up
\$0	-0.1500	-0.1500	-0.1500	-0.1500	-0.1500
\$5,000	-0.1130	-0.1135	-0.1138	-0.1141	-0.1143
\$10,000	-0.0760	-0.0769	-0.0776	-0.0781	-0.0785
\$15,000	-0.0389	-0.0403	-0.0413	-0.0421	-0.0426
\$20,000	-0.0019	-0.0037	-0.0051	-0.0060	-0.0068
\$25,000	0.0351	0.0329	0.0312	0.0300	0.0291
\$50,000	0.0694	0.0654	0.0625	0.0603	0.0586
\$75,000	0.1025	0.0972	0.0932	0.0902	0.0880
\$100,000	0.1346	0.1282	0.1234	0.1198	0.1171
\$150,000	0.1962	0.1883	0.1823	0.1778	0.1744
\$200,000	0.2550	0.2461	0.2394	0.2343	0.2304
\$250,000	0.3116	0.3021	0.2949	0.2894	0.2853
\$500,000	0.5693	0.5603	0.5534	0.5482	0.5443
\$750,000	0.7961	0.7909	0.7868	0.7837	0.7814
\$1,000,000	1.0000	1.0000	1.0000	1.0000	1.0000
\$1,250,000	1.1853	1.1914	1.1962	1.1999	1.2026
\$1,500,000	1.3551	1.3678	1.3778	1.3855	1.3912
\$1,750,000	1.5116	1.5312	1.5466	1.5585	1.5674
\$2,000,000	1.6567	1.6832	1.7041	1.7204	1.7325
\$2,250,000	1.7918	1.8252	1.8517	1.8722	1.8875
\$2,500,000	1.9180	1.9582	1.9902	2.0151	2.0336
\$2,750,000	2.0363	2.0833	2.1208	2.1499	2.1716
\$3,000,000	2.1475	2.2012	2.2440	2.2773	2.3021
\$3,500,000	2.3513	2.4179	2.4711	2.5125	2.5434
\$4,000,000	2.5340	2.6128	2.6759	2.7251	2.7618
\$4,500,000	2.6990	2.7894	2.8619	2.9185	2.9606
\$5,000,000	2.8490	2.9504	3.0317	3.0952	3.1426
\$6,000,000	3.1118	3.2334	3.3311	3.4074	3.4642
\$7,000,000	3.3352	3.4748	3.5872	3.6749	3.7400
\$10,000,000	3.8439	4.0276	4.1755	4.2908	4.3760
\$15,000,000	4.3818	4.6162	4.8049	4.9514	5.0584
\$20,000,000	4.9198	5.2048	5.4343	5.6119	5.7409
\$25,000,000	5.4577	5.7935	6.0637	6.2724	6.4234
\$30,000,000	5.9957	6.3821	6.6930	6.9330	7.1058
\$40,000,000	7.0716	7.5594	7.9518	8.2541	8.4708
\$50,000,000	8.1476	8.7367	9.2106	9.5751	9.8357
\$60,000,000	9.2235	9.9140	10.4694	10.8962	11.2006
\$70,000,000	10.2994	11.0913	11.7282	12.2173	12.5656
\$80,000,000	11.3754	12.2686	12.9870	13.5383	13.9305
\$90,000,000	12.4513	13.4459	14.2457	14.8594	15.2954
\$100,000,000	13.5272	14.6232	15.5045	16.1805	16.6604
\$125,000,000	16.2170	17.5664	18.6515	19.4832	20.0727
\$150,000,000	18.9068	20.5097	21.7984	22.7859	23.4851
\$200,000,000	24.2865	26.3962	28.0923	29.3912	30.3097
\$500,000,000	56.5643	61.7150	65.8557	69.0235	71.2578

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

LOCATION RATE SCHEDULE

The table below indicates a charge per exposure for the indicated bands. Basic rates apply to insuring agreements listed below.

Number of Exposures	Rate per Exposure
first 25	\$450.00
next 25	\$225.00
above 50	\$112.50

B: On Premises

C: In Transit

F: Counterfeit Money and Counterfeit Money Orders

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

LOCATION INCREASED LIMIT and RETENTION FACTORS

Determine the increased limit and retention premium by applying the calculated factor below to the basic premium.

Calculation:

Total limit = limit + retention

Final Factor = factor (total limit) - factor (retention)

For limits greater than 500M, calculate the ILF based on the following:

$$ILF(\text{limit}) = \{ ILF(500M) - ILF(200M) \} / 300M \times \{ \text{limit} - 500M \} + ILF(500M)$$

Total Limit or Retention Amount	Factor
\$0	-0.1500
\$5,000	-0.1098
\$10,000	-0.0698
\$15,000	-0.0300
\$20,000	0.0094
\$25,000	0.0487
\$50,000	0.0919
\$75,000	0.1315
\$100,000	0.1685
\$150,000	0.2373
\$200,000	0.3006
\$250,000	0.3599
\$500,000	0.6268
\$750,000	0.8360
\$1,000,000	1.0000
\$1,250,000	1.1330
\$1,500,000	1.2436
\$1,750,000	1.3373
\$2,000,000	1.4180
\$2,250,000	1.4882
\$2,500,000	1.5500
\$2,750,000	1.6049

Total Limit or Retention Amount	Factor
\$3,000,000	1.6539
\$3,500,000	1.7381
\$4,000,000	1.8076
\$4,500,000	1.8662
\$5,000,000	1.9162
\$6,000,000	1.9969
\$7,000,000	2.0593
\$10,000,000	2.1825
\$15,000,000	2.2879
\$20,000,000	2.3933
\$25,000,000	2.4986
\$30,000,000	2.6040
\$40,000,000	2.8148
\$50,000,000	3.0255
\$60,000,000	3.2363
\$70,000,000	3.4470
\$80,000,000	3.6578
\$90,000,000	3.8685
\$100,000,000	4.0793
\$125,000,000	4.6062
\$150,000,000	5.1331
\$200,000,000	6.1868
\$500,000,000	12.5094

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

INSURING AGREEMENT FACTOR

Apply the appropriate factor below by insuring agreement.

Insuring Agreement	Modification Factor
A.1.: Fidelity - Larceny or Embezzlement	0.9890
A.2.: Fidelity - Restoration Expense	0.0350
B: On Premises	0.9000
C: In Transit	0.0900
D: Forgery or Alteration	0.0300
E: Securities	0.6100
F: Counterfeit Money and Counterfeit Money Orders	0.0100
G: Claim Expense	0.2320
H: Stop Payment Orders or Wrongful Dishonor of Checks	0.2790
I.1.: Computer Systems - Computer Fraud	0.0930
I.2.: Computer Systems - Fraudulent Instructions	0.0840
I.3.: Computer Systems - Restoration Expense	0.0335
J: Uncollectible Items of Deposit	0.0075
Endorsement: Unauthorized Signature	0.0400

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

EXPENSE MODIFICATION PLAN

Apply expense modifier for the account related expense of underwriting and account handling or to reflect higher or lower commissions.

Eligibility:

A risk is eligible for the application of the Expense Modification Plan to the extent that such expense characteristics are not already reflected in the base rates and that any credit or debit developed under this section does not duplicate modification which have been contemplated in any other rating plan or schedule rating modification applied to the same risk.

Rules:

1. Document the individual underwriting file to support the application of the expense modifier.
2. Maximum modification in rates under this plan shall not exceed +/- 15%.
3. The Expense Modification Plan is in addition to any Schedule Rating modifications applicable to the risk provided there is no duplication of credits or debits.

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

RISK MODIFICATION FACTORS

Category	Modification Factors
Assets Under Management \$0 to \$50M \$50M to \$1B \$1B to \$10B \$10B to \$100B Over \$100B	0.50 - 0.90 0.90 - 1.00 1.00 - 1.15 1.15 - 1.25 1.25 - 2.00
Number of Funds Low Risk (1 to 25) Medium Risk (25 to 100) High Risk (100 plus)	0.90 - 1.00 1.00 - 1.10 1.10 - 1.20
Audit Type Average Below Average Significantly below Average	1.00 1.10 - 1.20 1.20 - 2.00
Services Providers Above Average Average Below Average	0.90 - 1.00 1.00 - 1.10 1.10 - 1.20
Fund Composition Average Below Average Significantly below Average	0.90 - 1.00 1.00 - 1.10 1.10 - 1.20

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

SCHEDULE RATING PLAN

An individual risk's exposure may deviate from an average risk. Such differences will be recognized by modifying the final developed premium as determined by the following:

Characteristics	Modification Range	
	Debit	Credit
Regulatory	25%	25%
Internal Controls	25%	25%
Business Stability	25%	25%
Financial Systems Controls	25%	25%
Unique / Unusual Exposures	25%	25%

The maximum credit / debit is +/- 25%.

Travelers Casualty and Surety Company of America

Guide(a) Rates
District of Columbia
Filing Number: 2014-12-0059

COINSURANCE

The coinsurance percent shall be equivalent to the percentage of loss which the insured is self-insuring.

The policy is subject to a maximum final modification factor of 0.85, or a credit of 15%.

$$\text{Final modification factor} = 1 - (0.90) * (\text{coinsurance percent})$$

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Supporting Document Schedules

Bypassed - Item:	Consulting Authorization
Bypass Reason:	Not applicable
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Certification (P&C)
Comments:	
Attachment(s):	IVBB Actuarial Memo.pdf
Item Status:	
Status Date:	

Satisfied - Item:	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
Comments:	
Attachment(s):	IVBB Indications (District of Columbia).pdf
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	Not applicable
Attachment(s):	
Item Status:	
Status Date:	

Travelers Bond and Financial Products
Investment Company Bond
2014-12-0059

Actuarial Memorandum

The Investment Company Bond (IVBB) rating plan is a new rating plan for Travelers Casualty and Surety Company of America. This new rating plan reflects considerations of our existing programs and consideration of five years of historical experience. The rates in the submitted rate plan were established so as to not be inadequate, excessive, or unfairly discriminatory.

Rating Plan Components

The proposed rating plan takes into account the characteristics of an individual risk and generates an appropriate premium for the coverage provided. This section discusses the development of the components of the proposed plans.

Products

At this time, Travelers is introducing rating to correspond with the form filing for Investment Company Bond.

Base Premiums

There are numerous insuring agreement options which can be purchased on the various products which this rating plan supports. A premium is determined for each of those individual insuring agreements and there are various exposure bases and base premiums used within the rating plan. The main exposure base incorporates both number of employees and number of locations. All of these exposure bases and base premiums are included within the rate plan itself.

Increased Limits and Retentions

The base premium is modified by the Increased Limit and Retention Factor to arrive at the total limits premium. The factors vary by employee count.

Other Modifications to Premium

The premium is modified to reflect risk characteristics and policy terms of the individual policy. The rate pages included with this filing describe additional rating steps that modify the base premium.

Rate Indication & Loss Ratio Development

The actuarial methodology used compares the historical loss ratio and the permissible loss ratio for the relevant book of business. The historical data is from Saint Paul Fire and Marine Insurance Company business that will be eligible for the new rating plan in Travelers Casualty and Surety Company of America. The historical loss ratio is developed using five years of premium and loss data for the book of business affected by this filing.

The development of the rate indication is detailed in the attached Exhibits. The overall indication is displayed in the State Indication and Countrywide Indication Pages. The state's experience is weighted with countrywide experience based on the credibility shown on the Credibility Exhibit.

The expense factors are based on countrywide data, with the exception of taxes, licenses and fees. This information is displayed in the State Expense and Countrywide Expense Pages.

The development of the profit and contingency load, including a consideration for investment income, is detailed in the State Investment Income and Countrywide Investment Income Pages.

Since there is a limited amount of loss experience to date for any one state, the loss development for this book of business is developed on a countrywide basis as shown in Countrywide Incurred Loss and LAE Development Exhibit. This same approach was used in selecting loss trends as shown on the Trend Selections Exhibit.



Travelers Casualty and Surety Company of America

IAMF Fidelity

IVBB

Exhibit 1s

District of Columbia Calculation of Rate Change

(Experience evaluated as of 12/31/2014)

Accident Year	Earned Premium*	Ultimate* L & ALAE**	Trend* Factor to 08/01/2017	Trended Ultimate L & ALAE	Trended Ultimate L & ALAE Ratio
2009	2,965	288	1.647	475	16.0%
2010	-	-	1.537	-	0.0%
2011	-	-	1.435	-	0.0%
2012	18,004	6,924	1.339	9,274	51.5%
2013	29,078	17,678	1.250	22,106	76.0%
Total	50,047	24,890		31,854	63.6%
(1)	State Loss and Allocated Loss Expense Ratio				63.6%
(2)	State Loss and Allocated Loss Expense Ratio loaded for Unallocated Loss Adjustment Expense				69.3%
	Unallocated Loss Adjustment Expense (ULAE)			8.8%	
(3)	Cred-Wtd Countrywide Loss and Allocated Loss Expense Ratio loaded for Unallocated Loss Adjustment Expense (*see Countrywide Indication Exhibit)				61.0%
(4)	State Credibility Factor: (*see Credibility Exhibit) Square Root of (50,047 / 3,014,098,186), capped at 1.000				0.004
(5)	State Credibility Weighted Loss and Loss Expense Ratio { (4) x (2) } + { (1.00 - (4)) x (3) }				61.0%
(6)	State Permissible Loss and Loss Expense Ratio (*see Expense Exhibit)				53.8%
(7)	State Indicated Rate Level Change { (5) / (6) } - 1.00				13.4%

*Exhibits Included

**Countrywide IBNR was allocated to state assuming the same distribution as a state's earned premium



Travelers Casualty and Surety Company of America

IAMF Fidelity

IVBB

Exhibit 1c

Countrywide Calculation of Rate Change

(Experience evaluated as of 12/31/2014)

Accident Year	Earned Premium*	Ultimate* L & ALAE	Trend* Factor to 08/01/2017	Trended Ultimate L & ALAE	Trended Ultimate L & ALAE Ratio
2009	3,250,954	8,868,034	1.647	14,603,440	449.2%
2010	3,412,465	853,924	1.537	1,312,733	38.5%
2011	3,397,782	1,189,279	1.435	1,706,752	50.2%
2012	3,306,251	1,279,357	1.339	1,713,665	51.8%
2013	3,346,586	2,034,582	1.250	2,544,128	76.0%
Total	16,714,038	14,225,176		21,880,718	130.9%

- (1) Countrywide Loss and Allocated Loss Expense Ratio **130.9%**
- (2) Credibility-Wghtd Countrywide Loss and ALAE Ratio
loaded for Unallocated Loss Adjustment Expense:
 $\{ (1) \times (5) + (1-(5)) \times (4a) \} \times (\text{ULAE load})$
- Unallocated Loss Adjustment Expense (ULAE)* **8.8%**
- (3) Countrywide Permissible Loss and Loss Expense Ratio **50.8%**
(*see Countrywide Expense Exhibit)
- (4) Trended Permissible Loss and Loss Expense Ratio **54.4%**
(4a) Without ULAE **50.0%**
- (5) Credibility assigned to Countrywide data (*see Credibility Exhibit) **7.4%**
- (6) Cred-Wghtd CW Indic Rate Level Chg **20.0%**
(2) / (3) -1

*Exhibits Included

02/04/2015

District of Columbia Investment Income Exhibit

1) Expenses and Profit Provision:	Nominal Value (NV)	Discount Factor (DFe)	Present Value (PV)
a) Commissions and Brokerage	16.8%	1.030	17.3%
b) General Expenses	6.2%	1.030	6.4%
c) Other Acquisition Expenses	11.8%	1.030	12.1%
d) Taxes, Licenses and Fees	2.0%	1.030	2.1%
<u>e) Unallocated Loss Adjustment Expenses</u>	<u>3.8%</u>	<u>0.979</u>	<u>3.7%</u>
f) Total Expenses { (1a) + (1b) + (1c) + (1d) + (1e) }	40.6%	1.026	41.6%
g) Target Pre-Tax Return on Premium (ROP) - based on 15% Target ROE	14.3%	1.000	14.3%
2) Premium Discount Factor (DFp) { (1.0 + pre-tax ROI)^(1.0 - Prem. Receipt Lag) }			1.030
3) Loss Discount Factor (DFI) { (1.0 + pre-tax ROI)-(Avg. Loss Payment Lag - 1.0) }			0.943
4) Permissible Loss Ratio (PLR) { [(2) - PV(1f) - PV(1g)] / (3) }			50.0%
5) Expected Combined Ratio Under Indicated Rate Change { (4) + NV(1f) }			90.6%
6) Expected Pre-Tax ROP Under Indicated Rate Change { (2) - PV(1f) - (3) x (4) }			14.3%
7) Underwriting Profit Provision Under Indicated Rate Change { 1.0 - (5) }			9.4%
8) Investment Income Ratio Under Indicated Rate Change { (6) - (7) }			4.9%
9) Expected ROE Under Indicated Rate Change { (1.0 - FIT) x (6) x P/S + ROC }			15.0%

**Countrywide Investment Income Exhibit**

1) Expenses and Profit Provision:	Nominal Value (NV)	Discount Factor (DFe)	Present Value (PV)
a) Commissions and Brokerage	16.8%	1.030	17.3%
b) General Expenses	6.2%	1.030	6.4%
c) Other Acquisition Expenses	11.8%	1.030	12.1%
d) Taxes, Licenses and Fees	4.8%	1.030	4.9%
<u>e) Unallocated Loss Adjustment Expenses</u>	<u>3.8%</u>	<u>0.979</u>	<u>3.7%</u>
f) Total Expenses { (1a) + (1b) + (1c) + (1d) + (1e) }	43.3%	1.026	44.4%
g) Target Pre-Tax Return on Premium (ROP) - based on 16% Target ROE	14.3%	1.000	14.3%
2) Premium Discount Factor (DFp) { (1.0 + pre-tax ROI)^(1.0 - Prem. Receipt Lag) }			1.030
3) Loss Discount Factor (DFI) { (1.0 + pre-tax ROI)-(Avg. Loss Payment Lag - 1.0) }			0.943
4) Permissible Loss Ratio (PLR) { [(2) - PV(1f) - PV(1g)] / (3) }			47.0%
5) Expected Combined Ratio Under Indicated Rate Change { (4) + NV(1f) }			90.3%
6) Expected Pre-Tax ROP Under Indicated Rate Change { (2) - PV(1f) - (3) x (4) }			14.3%
7) Underwriting Profit Provision Under Indicated Rate Change { 1.0 - (5) }			9.7%
8) Investment Income Ratio Under Indicated Rate Change { (6) - (7) }			4.6%
9) Expected ROE Under Indicated Rate Change { (1.0 - FIT) x (6) x P/S + ROC }			15.0%

**District of Columbia Expense and Profit Provisions**

	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>3-Year</u>	<u>Selected</u>
1) Commissions	18.6%	18.3%	18.1%	18.3%	16.8%
2) General	5.3%	5.9%	6.4%	5.9%	6.2%
3) Other Acquisition	10.7%	11.5%	11.5%	11.2%	11.8%
4) Taxes, Licenses & Fees	2.3%	2.5%	2.0%	2.3%	2.0%
5) Profit and Contingencies	9.4%	9.4%	9.4%	9.4%	9.4%
6) Total Expenses	46.3%	47.7%	47.5%	47.2%	46.2%

Notes:

(1) - (3): 3-year average from the Travelers Casualty and Surety Company of America Insurance Expense Exhibit.

(4): 2013 from the Travelers Casualty and Surety Company of America Insurance Expense Exhibit.

This IEE data is not specific to Financial Institutions Fidelity, but is inclusive of all Fidelity data.

(5): See the attached Investment Income exhibit

(6) = { (1) + (2) + (3) + (4) + (5) }

Countrywide Expense and Profit Provisions

	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>3-Year</u>	<u>Selected</u>
1) Commissions	16.9%	16.9%	16.6%	16.8%	16.8%
2) General	5.6%	6.2%	6.7%	6.2%	6.2%
3) Other Acquisition	11.3%	12.1%	11.8%	11.8%	11.8%
4) Taxes, Licenses & Fees	2.4%	2.6%	2.3%	2.5%	4.8%
5) Profit and Contingencies	9.7%	9.7%	9.7%	9.7%	9.7%
6) Total Expenses	45.8%	47.6%	47.1%	46.9%	49.2%

Notes:

(1) - (3): 3-year average from the Travelers Casualty and Surety Company of America Insurance Expense Exhibit.

(4): 2013 from the Travelers Casualty and Surety Company of America Insurance Expense Exhibit.

This IEE data is not specific to Financial Institutions Fidelity, but is inclusive of all Fidelity data.

(5): See the attached Investment Income exhibit

(6) = { (1) + (2) + (3) + (4) + (5) }

Trend Selections (Experience evaluated as of 12/31/2014)

LOSS RATIOS			
Accident Year	Gross EP	Ultimate Losses	Ultimate Loss Ratios
2004	31,425	8,145	25.9%
2005	56,553	16,178	28.6%
2006	64,549	18,917	29.3%
2007	66,363	26,913	40.6%
2008	63,341	74,240	117.2%
2009	59,880	104,836	175.1%
2010	58,110	39,884	68.6%
2011	57,302	40,797	71.2%
2012	57,113	45,482	79.6%
2013	52,868	41,744	79.0%

2-Year	-0.8%
3-Year	5.3%
4-Year	5.5%
5-Year	-13.4%
All Year	15.4%

FREQUENCY		
Accident Year	Ultimate Counts	Ultimate Frequency
2004	116	3.69
2005	127	2.25
2006	130	2.01
2007	106	1.59
2008	180	2.83
2009	152	2.54
2010	166	2.85
2011	134	2.34
2012	175	3.07
2013	137	2.60

2-Year	-15.3%
3-Year	5.5%
4-Year	-0.1%
5-Year	1.2%
All Year	0.9%

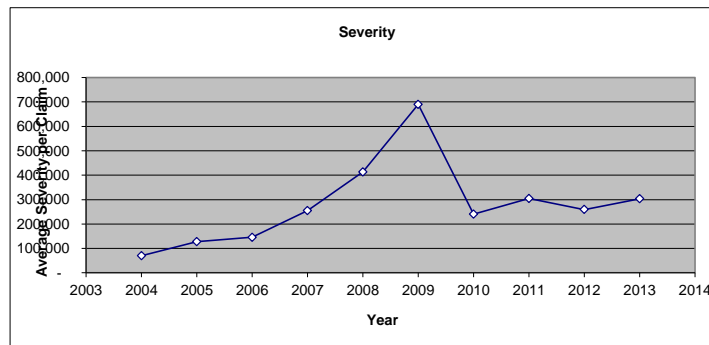
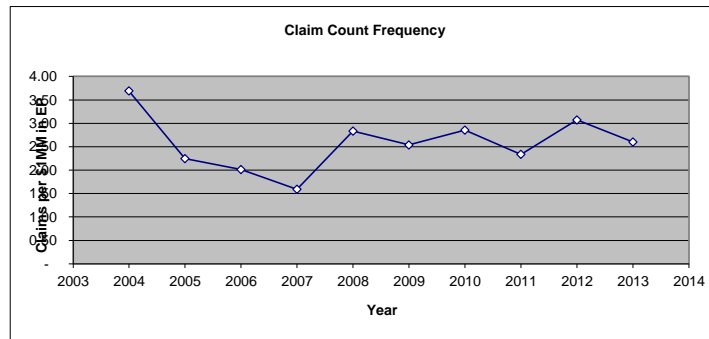
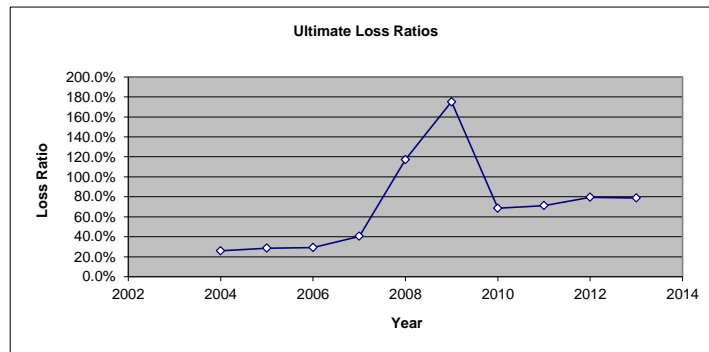
SEVERITY	
Accident Year	Ultimate Severity
2004	70,217
2005	127,385
2006	145,514
2007	254,670
2008	413,484
2009	689,716
2010	240,456
2011	304,624
2012	259,326
2013	303,600

2-Year	17.1%
3-Year	-0.2%
4-Year	5.5%
5-Year	-14.5%
All Year	14.4%

SELECTED

Selected Historical
Selected Prospective

Frequency	Severity	Loss Ratio
3.0%	4.0%	7.1%
3.0%	1.7%	4.8%



Summary of Trend Factors

Current Evaluation Date: 12/31/2014
Proposed Effective Date: 08/01/2016
Trend Date: 08/01/2017

Year	Trend to Current Years	Trend to Current Factors	Trend to Future Years	Trend Factors
2004	10.5	2.060	2.6	2.323
2005	9.5	1.923	2.6	2.169
2006	8.5	1.796	2.6	2.025
2007	7.5	1.676	2.6	1.890
2008	6.5	1.564	2.6	1.764
2009	5.5	1.460	2.6	1.647
2010	4.5	1.363	2.6	1.537
2011	3.5	1.273	2.6	1.435
2012	2.5	1.188	2.6	1.339
2013	1.5	1.109	2.6	1.250



Travelers Casualty and Surety Company of America

Countrywide Gross Total Incurred Loss - Financial Institutions Fidelity

Unlimited Loss & ALAE (000s)

AY		Evaluation Month																		
		12	24	36	48	60	72	84	96	108	120	132	144	156	168	180	192	204	216	228
1995		17,894	29,974	31,490	31,216	32,301	31,835	31,627	31,694	34,851	33,910	33,858	33,847	33,840	33,800	33,776	33,717	33,674	33,617	33,574
1996		9,508	28,360	30,774	31,740	34,524	34,317	34,861	36,970	34,254	34,214	33,758	33,747	33,725	33,736	33,724	33,539	33,526	33,505	33,483
1997		24,074	28,222	28,482	27,394	27,076	26,557	26,419	26,314	26,303	26,058	26,002	25,974	25,945	25,854	25,815	25,796	25,778	25,765	
1998		14,782	23,375	24,864	25,736	24,731	24,308	24,240	24,204	24,117	24,157	24,253	26,888	26,869	26,806	26,776	26,723	26,699		
1999		13,596	22,176	30,172	27,946	27,767	26,995	27,448	27,320	27,471	27,355	27,333	27,301	27,180	27,148	27,086	27,060			
2000		16,707	31,314	34,618	34,988	36,614	37,360	38,182	38,264	38,144	37,915	37,874	37,766	37,661	37,612	37,444				
2001		16,406	29,241	43,305	44,530	46,777	45,214	45,890	44,403	44,788	44,697	44,271	44,154	44,085	44,053					
2002		6,440	11,196	12,842	14,582	23,605	24,123	24,088	22,629	21,930	28,132	27,878	27,859	27,832						
2003		4,784	12,641	13,967	16,988	20,587	19,889	22,562	22,319	22,313	22,189	22,165	22,141							
2004		5,276	10,520	11,715	14,059	13,167	13,311	13,399	13,255	13,241	13,224	13,206								
2005		8,873	15,375	16,285	15,628	18,043	18,015	17,968	17,755	17,740	17,720									
2006		8,700	13,754	16,930	17,012	17,671	19,115	18,690	18,625	18,533										
2007		5,180	10,804	11,667	12,435	24,290	24,096	25,658	25,623											
2008		7,457	14,042	19,760	32,698	38,560	53,440	52,571												
2009		19,362	44,848	53,856	74,596	85,208	91,891													
2010		9,041	23,370	27,519	29,747	28,755														
2011		10,773	20,613	23,020	22,751															
2012		8,538	16,769	19,588																
2013		4,511	9,397																	
2014		4,495																		

Loss Development Factors

AY	Evaluation Month																		
	12-24	24-36	36-48	48-60	60-72	72-84	84-96	96-108	108-120	120-132	132-144	144-156	156-168	168-180	180-192	192-204	204-216	216-228	228-Ult
1995	1.675	1.051	0.991	1.035	0.986	0.993	1.002	1.100	0.973	0.998	1.000	1.000	0.999	0.999	0.998	0.999	0.998	0.999	0.998
1996	2.983	1.085	1.031	1.088	0.994	1.016	1.060	0.927	0.999	0.987	1.000	0.999	1.000	1.000	0.995	1.000	0.999	0.999	0.998
1997	1.172	1.009	0.962	0.988	0.981	0.995	0.996	1.000	0.991	0.998	0.999	0.999	0.996	0.999	0.999	0.999	0.999	0.999	0.999
1998	1.581	1.064	1.035	0.961	0.983	0.997	0.999	0.996	1.002	1.004	1.109	0.999	0.998	0.999	0.998	0.999	0.998	0.999	0.999
1999	1.631	1.361	0.926	0.994	0.972	1.017	0.995	1.006	0.996	0.999	0.999	0.996	0.999	0.998	0.999	0.998	0.999	0.999	0.999
2000	1.874	1.106	1.011	1.046	1.020	1.022	1.002	0.997	0.994	0.999	0.997	0.997	0.999	0.996	0.999	0.999	0.999	0.999	0.999
2001	1.782	1.481	1.028	1.050	0.967	1.015	0.968	1.009	0.998	0.990	0.997	0.998	0.999	0.999	0.998	0.999	0.999	0.999	0.999
2002	1.738	1.147	1.135	1.619	1.022	0.999	0.939	0.969	1.283	0.991	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999
2003	2.642	1.105	1.216	1.212	0.966	1.134	0.989	1.000	0.994	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999
2004	1.994	1.114	1.200	0.937	1.011	1.007	0.989	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999
2005	1.733	1.059	0.960	1.155	0.998	0.997	0.988	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999
2006	1.581	1.231	1.005	1.039	1.082	0.978	0.997	0.995	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999
2007	2.086	1.080	1.066	1.953	0.992	1.065	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999	0.999
2008	1.883	1.407	1.655	1.179	1.386	0.984													
2009	2.316	1.201	1.385	1.142	1.078														
2010	2.585	1.178	1.081	0.967															
2011	1.913	1.117	0.988																
2012	1.964	1.168																	
2013	2.083																		

Averages

3 Year	1.987	1.154	1.151	1.096	1.152	1.009	0.994	0.998	0.997	0.996	0.999	0.998	0.999	0.997	0.999	0.999	0.999	0.999	0.998
5 Year	2.172	1.214	1.235	1.256	1.107	1.006	0.992	0.992	1.055	0.996	0.998	0.998	0.998	0.998	0.998				
5 Year xHILO	2.121	1.182	1.177	1.120	1.053	0.996	0.992	0.998	0.999	0.996	0.998	0.998	0.998	0.998	0.998				
7 Year xHILO	2.073	1.179	1.105	1.096	1.032	1.010	0.986	0.998	0.997	0.997	0.999	0.999	0.999						
2 Year W.A.	2.005	1.140	1.039	1.092	1.174	1.009	0.998	0.997	0.999	0.999	0.999	0.999	0.999	0.996	0.999	0.999	0.999	0.999	
3 Year W.A.	1.964	1.154	1.217	1.113	1.144	1.003	0.995	0.998	0.997	0.995	0.998	0.998	0.999	0.997	0.999	0.999	0.999		
4 Year W.A.	2.135	1.174	1.287	1.183	1.138	1.002	0.994	0.998	1.080	0.993	0.998	0.998	0.999	0.997	0.998	0.999			
5 Year W.A.	2.202	1.201	1.268	1.168	1.124	1.002	0.993	0.991	1.050	0.995	0.998	0.998	0.998	0.998	0.998				

	12-24	24-36	36-48	48-60	60-72	72-84	84-96	96-108	108-120	120-132	132-144	144-156	156-168	168-180	180-192	192-204	204-216	216-228	228-Ult
Selected	2.172	1.214	1.235	1.256	1.032	1.006	0.992	0.992	1.055	0.996	0.998	0.998	0.998	0.998	0.998	0.999	0.999	0.999	1.000
Cumulative	4.340	1.998	1.645	1.332	1.061	1.028	1.021	1.029	1.037	0.983	0.988	0.989	0.992	0.993	0.995	0.997	0.998	0.999	1.000

Credibility Exhibit

Part A: Calculation of Full Credibility Standard

(1) Unadjusted Claim Count Full Credibility Standard: **1,082**

P	k		
	10.0%	7.5%	5.0%
0.900	271	481	1,082
0.950	384	683	1,537
0.980	541	962	2,165
0.990	664	1,180	2,654

Part B: Calculation of Historical Frequency

(2) Ultimate Claim Count: **6**

(3) Earned Premium: **16,714,038**

(4) Historical Frequency $\{(2)/(3)\} \times 1,000,000$: **0.4**

(5) Premium Credibility Standard $\{(1)/(4) \times 1,000,000\}$: **3,014,098,186**

(6) Countrywide Credibility $\{[(3)/(5)]^{.5}\}$: **0.07**

Note: The credibility standard is converted to an earned premium standard rather than a claim count standard by dividing the claim count by the historical claim frequency. This conversion is done so states are not penalized for experiencing low frequency.